## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

#### 1:18-CV-24227-CMA-Altonaga

JASON MILLER,	)
Plaintiff,	)
VS.	)
GIZMODO MEDIA GROUP, LLC, a Delaware Corporation, KATHERINE KRUEGER, individually, and WILL MENAKER, individually,	)
Defendants.	) )

#### UNOPPOSED MOTION TO APPEAR PRO HAC VICE, CONSENT TO DESIGNATION, AND REQUEST TO ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING

In accordance with Local Rule 4(b) of the Special Rules Governing the Admission and Practice of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of Claire Leonard of the law firm of Davis Wright Tremaine LLP, 1251 Avenue of the Americas, 21st Floor, New York, New York 10020, (212) 489-8230, for purposes of appearance as co-counsel on behalf of defendants Gizmodo Media Group, LLC and Katherine Krueger in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Claire Leonard to receive electronic filings in this case, and in support thereof states as follows:

1. Claire Leonard is not admitted to practice in the Southern District of Florida and is a member in good standing of the bar of the State of New York. Attached hereto is a certificate of good standing from the Clerk of the Appellate Division of the New York Supreme Court, First Department.

Moyant Deanna K. Shullman, Esquire, of the law firm of Shullman Fugate PLLC,

2101 Vista Parkway, Suite 4006, West Palm Beach, Florida 33411, (561) 429-3619, is a member in good standing of the Florida Bar and the United States District Court for the Southern District of Florida, maintains an office in this State for the practice of law, and is authorized to file

through the Court's electronic filing system. Movant consents to be designated as the member of

the Bar of this Court with whom opposing counsel may readily communicate regarding the

conduct of the case, upon whom filings shall be served, who shall be required to electronically

file and serve all documents and things that may be filed and served electronically, and who shall

be responsible for filing and serving documents in compliance with the CM/ECF Administrative

Procedures. See Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, Claire Leonard has made payment

of this Court's \$75.00 admission fee. A certification in accordance with Rule 4(b) is attached

hereto.

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4. Claire Leonard, by and through designated counsel and pursuant to Section 2B

CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic

Filings to Claire Leonard at the e-mail address: claireleonard@dwt.com.

WHEREFORE, Deanna K. Shullman moves this Court to enter an Order for Claire

Leonard to appear before this Court on behalf of defendants Gizmodo Media Group, LLC and

Katherine Krueger, for all purposes relating to the proceedings in the above-styled matter and

directing the Clerk to provide notice of electronic filings to Claire Leonard.

Date: December 10, 2018

Respectfully submitted, /s/ Deanna K. Shullman Deanna K. Shullman Florida Bar No. 0514462 dshullman@shullmanfugate.com SHULLMAN FUGATE PLLC

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2101 Vista Parkway, Suite 4006 West Palm Beach, FL 33411 Tel: (561) 429-3619 Attorneys for Defendants Gizmodo Media Group LLC and Katherine Krueger

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

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Plaintiff,	) )
vs.	)
GIZMODO MEDIA GROUP, LLC, a Delaware Corporation, KATHERINE KRUEGER, individually, and WILL	)
MENAKER, individually,	)
Defendants.	Ó

#### **CERTIFICATION OF CLAIRE LEONARD**

Claire Leonard, Esquire, pursuant to Rule 4(b) of the Special Rules Governing the Admission and Practice of Attorneys, hereby certifies that (1) I have studied the Local Rules of the United States District Court for the Southern District of Florida; and (2) I am a member in good standing of the State of New York Bar.

Claire Leonard

Case No. 1:18-cv-24227-CMA

CERTIFICATION PURSUANT TO S.D. FLA. L.R. 7.1(a)(3)

Defendants' undersigned counsel, Deanna K. Shullman, hereby certifies that counsel for

Defendants has conferred with counsel for Plaintiff and they have consented to the filing of this

motion.

**CERTIFICATE OF SERVICE** 

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Appear

Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of

Electronic Filings was served by CM/ECF on December 10, 2018 on all counsel or parties of

record on the service list.

/s/ Deanna K. Shullman

Deanna K. Shullman

#### Case No. 1:18-cv-24227-CMA

#### **SERVICE LIST**

Attorneys for Plaintiff:

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# Appellate Division of the Supreme Court of the State of New York First Judicial Department

I, Susanna Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, certify that

#### CLAIRE KRAMER LEONARD

was duly licensed and admitted to practice as an Attorney and Counsellor at Law in all the courts of the State of New York on **December 9, 2013**, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counsellors at Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an attorney and counsellor at law.

In Witness Whereof, I have hereunto set my hand and affixed the seal of this court on

December 7, 2018

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Clerk of the Court

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

#### 1:18-CV-24227-CMA-Altonaga

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Plaintiff,	)	
VS.	)	
GIZMODO MEDIA GROUP, LLC, a Delaware Corporation, KATHERINE KRUEGER, individually, and WILL		
MENAKER, individually,	)	
Defendants.	)	

## [PROPOSED] ORDER GRANTING MOTION TO APPEAR PRO HAC VICE, CONSENT TO DESIGNATION, AND REQUEST TO ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING

THIS CAUSE having come before the Court on the Motion to Appear *Pro Hac Vice*Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for

Claire Leonard (the "Motion"), pursuant to the Special Rules Governing the Admission and

Practice of Attorneys in the United States District Court for the Southern District of Florida and

Section 2B of the CM/ECF Administrative Procedures. This Court having considered the motion

and all other relevant factors, it is hereby

#### ORDERED AND ADJUDGED that:

The Motion is GRANTED. Claire Leonard may appear and participate in this action on behalf of defendants Gizmodo Media Group, LLC and Katherine Krueger. The Clerk shall provide electronic notification of all electronic filings to Claire Leonard at claireleonard@dwt.com.

DONE AND ORD	DERED in Chambers at _		_, Florida, this
day of	, 2018.		
		Hon. Cecilia Altonaga United States District Judge	<del></del>
Copies furnished to: All Counsel of Records			